

THE HONORABLE RICHARD A. JONES

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROMAN SELEZNEV,

Defendant.

Case No. CR11-70RAJ

DEFENDANT'S EXHIBIT LIST FOR
EVIDENTIARY HEARING ON
DEFENSE MOTION TO DISMISS
INDICTMENT

Defendant Roman Seleznev, through his undersigned attorneys, submits the following
list of exhibits he intends to introduce at the hearing on his motion to dismiss the indictment:

EXHIBITS

Exhibit	Description	Bates No.
101	United States Department of Justice press release, "Russian Hacker Arrested for Computer Hacking Scheme that Victimized Thousands of Credit Card Customers," July 7, 2014.	
102	U.S. Department of Homeland Security/U.S. Secret Service Press Release, July 7, 2014.	

DEFENDANT'S EXHIBIT LIST FOR
EVIDENTIARY HEARING ON DEFENSE
MOTION TO DISMISS INDICTMENT - 1

LAW OFFICES
CALFO HARRIGAN LEYH & EAKES LLP
999 THIRD AVENUE, SUITE 4400
SEATTLE, WASHINGTON 98104
TEL, (206) 623-1700 FAX, (206) 623-8717

Exhibit	Description	Bates No.
103	“Foreign Ministry outraged by Russian citizen’s detention by US secret service in Maldives,” Tass Russian News Agency, July 8, 2014; “Comment by the Information and Press Department of the Russian Ministry of Foreign Affairs regarding the situation involving the kidnapping of the Russian national Roman Seleznyov by US intelligence agencies,” July 11, 2014; and “Russia Demands United States Release Accused Hacker Roman Selevnez Immediately,” Reuters, July 15, 2014.	
104	Declaration of Roman Seleznev	
105	March 13, 2013 U.S. Secret Service Investigative Report	USSS_PHOENIX 00029-31
106	<i>United States v. Seleznev</i> , No. 14-00056 (D. Guam), Dkt. No. 46, Transcript of Proceedings on July 31, 2014	
107	July 24, 2014 Declaration of Sharafulla Shihab	
108	August 7, 2014 Decision and Order re: Motion to Discharge and Release Defendant Pursuant to Fed. R. Crim. P. 12(b)(3)(A), Guam Proceeding, Dkt. No. 44	
109	U.S. Attorneys’ Manual, Chapter 9-15	
110	Constitution of the Republic of the Maldives (2008) (English translation)	
111	U.S. Attorneys’ Criminal Resources Manual, § 611	
112	“Member Countries,” http://www.interpol.int/Member-countries/World (last accessed April 2, 2015)	

Exhibit	Description	Bates No.
113	"Notices," http://www.interpol.int/INTERPOL-expertise/Notices (last accessed April 2, 2015)	
114	July 17, 1999 Treaty between the United States of America and the Russian Federation on Mutual Legal Assistance in Criminal Matters, Preamble (the "MLAT")	
115	September 15, 2010 U.S. Secret Service Investigative Report	USSS_CINCINATT I_00011-14
116	May 10, 2011 Secret Service Investigative Report	USSS_CINCINATT I 00069-72
117	United Nations International Covenant on Civil and Political Rights (the "ICCPR"), including Articles 9 and 13	
118	Diagrams of the Male Airport	
119	July 9, 2014 Certified Inventory of Evidence	USSS_0000192-194
120	Photograph of Anna Otisko passport stamps	
121	Video of July 15, 2014 State Department Daily Briefing, found at http://www.c-span.org/video/?320444-1/state-department-briefing	
122	Docket 136, April 13, 2015 Government's Response to Defendant's Motion to Dismiss the Indictment	
123	Docket 146, April 28, 2015 Government's Submission Re: Status Conference on Evidentiary Hearing	

1 DATED this 8th day of December, 2015.

2 CALFO HARRIGAN LEYH & EAKES LLP

3
4 By s/Angelo J. Calfo
Angelo J. Calfo, WSBA #27079

5
6 By s/Andrea D. Ostrovksy
Andrea D. Ostrovsky, WSBA #37749

7 999 Third Avenue, Suite 4400
8 Seattle, WA 98104
9 Telephone: (206) 623-1700
10 Fax: (206) 623-8717
Email: angeloc@calfoharrigan.com
andreao@calfoharrigan.com

11 Attorneys for Defendant
12 Roman Seleznev

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Norman McIntosh Barbosa norman.barbosa@usdoj.gov

C. Seth Wilkinson seth.wilkinson@usdoj.gov

Harold Chun harold.chun@usdoj.gov

s/Susie Clifford